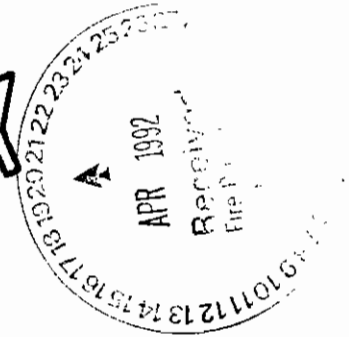




1920 Main Street  
Suite 600  
Irvine, California 92714-7210  
(714) 476-3040  
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COPY



April 16, 1992

Mr. Dave Dickson  
Hazardous Waste Specialist  
Orange County Health Department  
Hazardous Materials Management Section  
P.O. Box 355  
Santa Ana, California 92075

RE: Emergency Response Corrective Actions  
1551 Orangethorpe Avenue in Fullerton, California

Dear Mr. Dickson:

The purpose of this correspondence is to document activities at the above referenced facility from the period of March 23, 1992 through April 9, 1992. On March 24, 1992, ERM-EnviroClean-West, Inc. (EnviroClean) was contacted by a representative from McLachlan Investment Company (MIC). MIC requested that EnviroClean respond to an emergency situation at the Orangethorpe facility.

This facility was abandoned by the tenant. Waste materials (including hazardous materials and potentially hazardous materials) were improperly stored. These materials included paints, solvents and acids. In addition, there was considerable amounts of debris scattered across the site making movement of response vehicles very difficult.

Recent rainfall had accumulated in bermed areas used for drum storage and in a truck loading dock. It is estimated that approximately 100,000 gallons of standing water was present in these areas. Because of the materials historically handled in these areas, this water was considered to be potentially hazardous. EnviroClean collected water samples from each area for analytical testing. The purpose of these tests was to profile hazardous characteristics (if any) of water in each area. These samples were submitted to Associate Laboratories with the expectation that results would be available in 24 hours. However, because of a failure of testing equipment at the laboratory, analytical testing actually required approximately five days. Analytical results (Attachment A) indicated accumulated water in the truck dock area was not hazardous. This water was discharged by MIC.

Mr. Thompson  
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Debris was consolidated to the extent that equipment could reach areas of concern. A vacuum truck was used to pump water from the bermed areas into empty drums that were available on-site. All drums on site were checked for leaks, tight covers and bungs. Drums scattered across the site were collected and placed into the bermed areas. Each bermed area was then covered with visqueen plastic sheeting and the site was secured for the day.

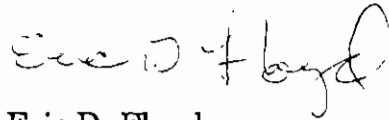
On the 25th of March, an EnviroClean Site Manager visited the site and inventoried and removed drums of hazardous and potentially hazardous materials from the interior and stored them in one of the bermed areas. Drums containing corrosive materials were stored in the compressor room. All drums inside and outside of the building were covered.

Thirteen samples were collected from unknown liquids in the storage area on the west side of the building. As each sample was collected, the pH of the liquid was also measured. Ph values of these liquids ranged from approximately 10 to 1.5. These samples were submitted to Associated Laboratories for analytical testing. Waste in these drums will be recycled or disposed of based on these analytical results.

If you require additional information, please contact our Irvine office.

Sincerely,

ERM-ENVIROCLEAN-WEST, INC.



Eric D. Floyd  
EDF/edf/9078

cc: C. Thomas Thompson, City of Fullerton Fire Prevention Bureau  
Dianne L. Robins, McLachlan Investment Company  
Ron Coulombe, Coulombe and Kottke